

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

STACIE PERCELLA,

*Plaintiff,*

v.

CITY OF BAYONNE, JOSEPH WAKS,  
INDIVIDUALLY, AND RICHARD  
CENSULLO, INDIVIDUALLY

*Defendants.*

Civil Action No. 14-cv-03695(KM)(MCA)

Civil Action

**NOTICE OF DEFENDANT'S, CITY OF  
BAYONNE, JOSEPH WAKS AND  
RICHARD CENSULLO, MOTION FOR  
SUMMARY JUDGMENT**

TO: Bruno Gerbino, Esquire  
Gerbino Soriano & Aitken, LLP  
70 Hilltop Road, Suite 1005  
Ramsey, NJ 07446  
Attorneys for Plaintiff

PLEASE TAKE NOTICE that on June 15, 2020, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, attorney for the Defendants, City of Bayonne, Joseph Waks, and Richard Censullo (the "Defendants") shall apply, by way of Motion before the United States District Court for the District of New Jersey, for an Order granting Summary Judgment, pursuant to Fed. R. Civ. P. 56, in favor of the Defendants.

PLEASE TAKE FURTHER NOTICE that Defendants will rely upon the Certification and Brief of Teresa M. Lentini, Esquire on behalf of this Motion.

A proposed form of Order is annexed hereto.

**FLORIO PERRUCCI STEINHARDT  
CAPPELLI TIPTON & TAYLOR, LLC**  
Attorneys for Defendants

Dated: May 14, 2020

By: /s/ Teresa M. Lentini  
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